



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC COMPANY D/B/A NATIONAL GRID

D.T.E. 06-67

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO MASSACHUSETTS ELECTRIC COMPANY AND NANTUCKET ELECTRIC COMPANY D/B/A NATIONAL GRID

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") submits to Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid ("MECo" or "Company") the following Information Requests:

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please file one copy of the responses with Mary L. Cottrell, Secretary of the Department, and all parties to this proceeding; also submit two (2) copies of the responses to John J. Geary, Hearing Officer, one (1) copy of the responses to Sean Hanley, Assistant Director, Rates and Revenue Requirements Division; one (1) copy of the responses to Stephen Crowley, Analyst, Rates and Revenue Requirements Division; and one (1) copy of the responses to Barry Perlmutter, Analyst, Electric Power Division.
8. In addition to filings all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us and to the e-mail address of any party required to be served.
9. Responses are due on or before Monday, September 25, 2006.

INFORMATION REQUESTS

- DTE 1-1 The Company’s filing at 2 states that “[b]eginning with the ISO-NE invoice for October 2005 monthly services, ISO-NE ... began assessing National Grid for GIS costs associated with its default service load.” For the period October 2005 through the present, please provide the following information on a monthly basis:
- (a) How many dollars in GIS-related costs did ISO-NE assess to the Company for its default service load?

- (b) How much of the costs identified in (a) did the Company include in the calculation of its default service rates?
- (c) How much of the costs identified in (a) did MECo recover through its existing default service adjustment provision, M.D.T.E. No. 1062-C?
- (d) How much of the costs identified in (a) did the Company recover through other means and identify those means?
- (e) How much of the costs identified in (a) does MECo propose to recover through its amended default service adjustment provision, M.D.T.E. No. 1102?

DTE 1-2 On a going-forward basis, does the Company propose to include GIS-related costs in the calculation of its default service rates? Please provide a full explanation.

DTE 1-3 Please provide an estimate of the GIS-related costs that MECo will seek to recover in its next reconciliation filing through its amended default service adjustment provision, M.D.T.E. No. 1102, and identify the period for which recovery will be sought. Include all supporting workpapers and calculations.

DTE 1-4 Please supply a chronological summary of all requests to the Department to recover GIS costs. In your summary, include: (1) the date of the request; (2) the period for which recovery was requested; (3) the dollar amount requested to be recovered; (4) the rate or mechanism through which the costs would be recovered; and (5) the status of the request.

DTE 1-5 Please provide a brief description of the rules governing the allocation and billing of GIS costs from its inception to the present. Include the effective date of each change in the rules, a reference to where the rule is found, and the Federal Energy Regulatory Commission docket number that approved each change.